

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**JAMES EDWARDS,**

**Plaintiff,**

**v.**

**Civil Action 2:17-cv-236  
Chief Judge Edmund A. Sargus, Jr.  
Magistrate Judge Jolson**

**CRAIG ALAN MATTHEWS, et al.,**

**Defendants.**

**STIPULATED PROTECTIVE ORDER**

This stipulated protected order covers all medical records, including psychological and psychiatric records of James Edwards and each individual defendant which have been or will be produced or obtained in discovery in this case. These records shall be subject to discovery between and among the parties but shall otherwise be kept confidential.

These confidential medical records shall be held strictly confidential by counsel for each party and may only be disclosed to counsel for each party, the parties, and expert witnesses who need access to the material. None of the documents covered by this protective order may be disclosed to any other person, or member of the public. If any document subject to this protective order is produced, copied, used in a deposition, or at trial, it shall be marked prominently with the word "CONFIDENTIAL."

Any "CONFIDENTIAL" designation is subject to challenge by any party or non-party with standing to object. Before filing any motions or objections to a confidentiality designation with the Court, the objecting party shall have an obligation to meet and confer in a good faith

effort to resolve the objection by agreement. If agreement is reached confirming or waiving the “CONFIDENTIAL” designation as to any documents subject to the objection, the designating party shall serve on all parties a notice specifying the documents and the nature of the agreement.

Before a party files any document subject to this order or uses it at trial or in any other way so as to make it a potentially public record, the party shall either move to file the document “under seal” with prior permission of the Court, or give seven days’ notice to all other parties of their intent to make the document public so another party may file a motion to seal the document.

This Protective Order does not authorize filing protected materials under seal. No document may be filed with the Court under seal without prior permission as to each such filing, upon motion and for good cause shown, including the legal basis for filing under seal. *See Procter & Gamble Co. v. Bankers Trust Co.*, 78 F.3d 219 (6th Cir. 1996).

At the conclusion of the litigation, all written materials, including copies made thereof, subject to this protective order shall be returned to counsel who produced the materials.

IT IS SO ORDERED.

Date: May 30, 2017

/s/ Kimberly A. Jolson  
KIMBERLY A. JOLSON  
UNITED STATES MAGISTRATE JUDGE

Agreed to by:

s/ Adam G. Gerhardstein  
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